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Boyd W. Gentry
Admitted in Ohio & Kentucky

Zachary P. Elliott
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March 21, 2022

VIA EMAIL ONLY

Richard J. Meier, Esq. (richard@lpglaw.com)
LITIGATION PRACTICE GROUP
17542 E. 17th Street, Suite 100
Tustin, CA 92780
Counsel for Plaintiff

RE: McCain v. LTD Financial Services, LP, Case 1:22-cv-00043-TSB

Richard,

Please allow this letter to serve as my client's response to your settlement offer. My client rejects your settlement offer. While the alleged letters were dated October 25, 2022, LTD did not receive the first one until December 7, 2021. LTD received another copy of the letter on December 15, 2021. LTD had no communication with Plaintiff after December 7, 2021.

Sincerely,

/s/Boyd W. Gentry

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
CINCINNATI DIVISION**

Charlotte McCain,	:	
	:	Case No: 1:22-cv-43
Plaintiff,	:	
	:	
v.	:	Judge: Timothy S. Black
	:	
LTD Financial Services, L.P.,	:	
	:	Initial Disclosures of Defendant LTD
Defendant.	:	Financial Services, L.P.
	:	

Now comes Defendant LTD Financial L.P. and for its initial disclosures pursuant to Fed.R.Civ.P. 26(a)(1)(A), provides the following:

1. **Rule 26(a)(1)(A)(i)** - [T]he name and, if known, the address and telephone number of each individual likely to have discoverable information-along with the subjects of that information-that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.”
 - Corporate representative of LTD Financial L.P. % Boyd W. Gentry, 4031 Colonel Glenn Highway, Beavercreek, Ohio 45431. This representative will have knowledge of the allegations in the complaint and defenses raised in the answer to the complaint.
2. **Rule 26(a)(1)(A)(ii)** - “[A] copy of-or a description by category and location of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody or control any may use to support its claims or defenses, unless the use would be solely for impeachment.”
 - Business records concerning the allegations in the complaint, attached hereto as LTD001-012.
3. **Rule 26(a)(1)(A)(iii)** - “[A] computation of each category of damages claimed by the disclosing party-who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.”
 - N/A
4. **Rule 26(a)(1)(A)(iv)** - “[F]or inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy

all or part a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.”

- N/A

Respectfully submitted,

/s/ Zachary P. Elliott

Boyd W. Gentry (0071057)

Zachary P. Elliott (0090057)

Law Office of Boyd W. Gentry, LLC

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Tel. (937) 839-2881

Fax (800) 839-5843

bentry@boydgentrylaw.com

zelliott@boydgentrylaw.com

Counsel for LTD Financial Services, LP

Certificate of Service

I hereby certify that a true and accurate copy of the foregoing Initial Disclosures of Defendant LTD Financial Services, L.P. has been served via email service to the following on March 21, 2022.

Richard J. Meier, Esq. (richard@lpglaw.com)
LITIGATION PRACTICE GROUP
17542 E. 17th Street, Suite 100
Tustin, CA 92780
Tel: (657) 600-9790
Fax: (949) 315-4332
Counsel for Plaintiff

/s/ Zachary P. Elliott
Zachary P. Elliott (0090057)

2021/12/15
17:19:51LTD FIN SVCS (post)
ACCOUNT INFORMATIONPAGE 1
SCRIP340
SONDRAJURI-----
MASTER ACCOUNT INFO. ACCOUNT NUMBER: T60 xxxxxxxxxxxxx7161 REFERENCE NUMBER: 027681996
-----NAME: MCCAIN, CHARLOTTE B --- MULTIPLES ---
ADDRESS: 401 SHELBURNE WAY
CITY: NICHOLASVILLE STATE: KY ZIP: 40356-6502
PHONE: SSN: xxx-xx-7443

DATE RECEIVED: 2021/10/05 PLACEMENT DATE: 2021/10/05

PLACEMENT AMOUNT:	12,071.48	STATUS:
ADJUSTMENTS:	.00	ARCHIVE DATE:
PAID TO CLIENT:	.00	
PAID TO AGENCY:	.00	
BALANCE:	12,071.48	SPECIAL ID 1:
AMT CANCELED:	.00	2: D
AMT NSF:	.00	3:
TOTAL CLNT INTEREST:	.00	4:
CUR. CLNT INTEREST:	.00	5:
TOTAL AGCY INTEREST:	.00	6:
CUR. AGCY INTEREST:	.00	- INTEREST INFORMATION -
CUR. PRINCIPLE:	12,071.48	RATE: .00

--- NEARBYS ---

OPEN DATE: 2013/09/23	CHARGE OFF: 2021/06/29	LAST CALC.DATE: 0/00/00
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MAINT DATE: 2021/12/15 SONDR AJURI

EMPLOYER NAME:	PHONE:	EXT: 00000
ADDRESS:	CITY:	STATE: ZIP:

SPOUSE NAME:	SPOUSE POE:	SPOUSE PHONE:
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PHONE 1:	DESCRIPTION 1:
PHONE 2:	DESCRIPTION 2:
PHONE 3:	DESCRIPTION 3:

ORIGINAL ADDRESS ACCOUNT NUMBER: T60 xxxxxxxxxxxxx7161 REFERENCE NUMBER: 027681996
-----ADDRESS: 401 SHELBURNE WAY
CITY: NICHOLASVILLE STATE: KY ZIP: 40356-6502
PHONE:-----
FINANCIAL TRANSACTIONS ACCOUNT NUMBER: T60 xxxxxxxxxxxxx7161 REFERENCE NUMBER: 027681996

ENT DTE	ENT TME TC	TRANSACTION ID	TRANS AMT	FEE AMT	AMT TO PRIN	AMT AGCY INT	AMT CLT INT	BALANCE	DEP DTE	RMT DTE
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MATCH RECORD INFO. ACCOUNT NUMBER: T60 xxxxxxxxxxxxx7161 REFERENCE NUMBER: 027681996

LETTER TRANSACTIONS ACCOUNT NUMBER: T60 xxxxxxxxxxxxx7161 REFERENCE NUMBER: 027681996

LETTER CODE	DUE DATE	SENT DATE
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LTD001

2021/12/15
17:19:51LTD FIN SVCS (post)
ACCOUNT INFORMATIONPAGE 2
SCRIP340
SONDRAJURI-----
LETTER TRANSACTIONS ACCOUNT NUMBER: T60 xxxxxxxxxxxxx7161 REFERENCE NUMBER: 027681996

LETTER CODE	DUE DATE	SENT DATE
01	2021/10/06	2021/10/06
20	2021/11/10	2021/11/10

COLLECTOR COMMENTS ACCOUNT NUMBER: T60 xxxxxxxxxxxxx7161 REFERENCE NUMBER: 027681996

DATE	TIME	PLACE	WHO	COMMENT	COLLECTOR	STATUS
2021/12/15	13:02:00			A/R entered - N,DSP	78818	
2021/12/15	13:02:55	O	O	RCVD WRITTEN DSP FR LITIGATION PRACTICE GROUP--AW	78818	219
2021/12/15	17:19:23	O	O	recieved threat of suit - placing on hold - SKJ	78776	219
2021/12/15	17:19:26	M	V	MOVED TO COLL. 99926 FROM 99966 BY SONDRAJURI	78776	219
2021/12/09	10:10:20	O	O	MEDIA SENT TO SCAN***ARD	78810	219
2021/12/09	13:44:08	O	O	media sent to consumer***ard	78810	219
2021/12/07	13:19:15			A/R entered - N,VAL	78818	
2021/12/07	13:20:58	O	O	RCVD VAL REQ FR LITIGAITON PRACTICE GROUP- REQ A COPY OF THE	78818	219
2021/12/07	13:21:29	O	O	OPERATIVE CONTRACT, A SUMMARY OF THE CHARGES MAKING UP THE	78818	219
2021/12/07	13:21:59	O	O	ALLEGED BALANCE, AND/OR ANY APPLICABLE COLLECTION AGREEMENT-AW	78818	219
2021/12/07	13:22:06	M	V	MOVED TO COLL. 99966 FROM 08253 BY ASHLEYWALK		219
2021/11/30	13:39:13			A/R entered - N,RVW	8253	
2021/11/30	13:41:18	O	O	waitng on poa 8253	8253	219
2021/11/18	13:36:54			A/R entered - O,ATY	12535	
2021/11/18	13:36:54			P1-7034727447 dialed, Dur 5:37	12535	
2021/11/18	13:46:01			Atty info activated by NORMAPEREZ		
2021/11/18	13:46:21	H	O	crd, soft id cm/ ver dob and address, wim, acnt sts, std we	12535	218
2021/11/18	13:46:40	O	O	have to call her attorney, provided name and number, declined	12535	218
2021/11/18	13:46:58	O	O	to say if she is doing bankrupcy or debt consolidation std	12535	218
2021/11/18	13:47:02	O	O	we have to call them	12535	218
2021/11/18	14:15:46			A/R entered - A,NML	8253	
2021/11/18	14:16:34			A-9497150644 dialed	8253	
2021/11/18	14:20:55	O	A	clld atty off qa tt john cllng to see if they represent cst	8253	219
2021/11/18	14:24:13	O	O	sd they do repersent cst ask if he can email poa sd only able	8253	219
2021/11/18	14:24:40	O	O	answer yes or no queastion gve cont and email1 addr1 ..8253	8253	219
2021/11/16	8:35:15	O	O	ph p2 - na - Dispstn Code = NOA - man		
2021/11/15	11:51:08	O	O	ph p2 - na - Dispstn Code = NOA - man		
2021/11/15	11:51:31	O	O	ph p1 - na - Dispstn Code = ABN - man		
2021/11/12	11:28:19	O	O	ph p2 - na - Dispstn Code = NOA - man		
2021/11/12	11:29:29	O	O	ph p1 - na - Dispstn Code = NOA - man		
2021/11/10	9:18:52	O	O	ph p2 - na - Dispstn Code = NOA - man		
2021/11/10	9:19:47	O	O	ph p1 - na - Dispstn Code = AMD - man		
2021/11/05	15:58:19	O	O	ph p1 - na - Dispstn Code = AMD - man		
2021/11/04	8:17:19	O	O	ph p2 - na - Dispstn Code = NOA - man		
2021/11/04	8:46:21	O	O	ph p1 - na - Dispstn Code = AMD - man		
2021/11/02	9:08:06	O	O	ph p1 - na - Dispstn Code = AMD - man		
2021/11/02	9:10:42	O	O	ph p2 - na - Dispstn Code = AMD - man		
2021/10/29	11:56:52	O	O	ph p2 - na - Dispstn Code = AMD - man		
2021/10/29	13:14:44	O	O	ph p1 - na - Dispstn Code = AMD - man		
2021/10/27	8:07:24			A/R entered - O,NOA O,AMN	8253	
2021/10/27	8:07:31			P2-5408688547 dialed, Dur :22	8253	
2021/10/27	8:07:55			P1-7034727447 dialed, Dur :17	8253	
2021/10/27	8:08:03	O	O	POSS2 REC SD CALL CLDNT BE COMPLTD AT THS TIME ////POSS1 REC	8253	230

2021/12/15
17:19:51LTD FIN SVCS (post)
ACCOUNT INFORMATIONPAGE 3
SCRIP340
SONDRAJURI

COLLECTOR COMMENTS ACCOUNT NUMBER: T60 xxxxxxxxxxxx7161 REFERENCE NUMBER: 027681996

DATE	TIME	PLACE	WHO	COMMENT	COLLECTOR	STATUS
2021/10/27	8:08:09	O	O	ON NML 8253	8253	230
2021/10/25	10:40:41	O	O	ph p1 - na - Dispstn Code = AMD - man		
2021/10/22	8:48:35	O	O	ph p1 - na - Dispstn Code = AMD - man		
2021/10/22	8:49:23	O	O	ph p2 - na - Dispstn Code = AMD - man		
2021/10/21	9:01:16	O	O	ph p1 - na - Dispstn Code = AMD - man		
2021/10/21	9:02:27	O	O	ph p2 - na - Dispstn Code = AMD - man		
2021/10/19	9:16:08	O	O	ph p1 - na - Dispstn Code = AMD - man		
2021/10/19	9:25:38	O	O	ph p2 - na - Dispstn Code = AMD - man		
2021/10/15	14:51:36	O	O	ph p1 - na - Dispstn Code = AMD - man		
2021/10/12	15:33:01	O	O	ph p1 - na - Dispstn Code = AMD - man		
2021/10/12	15:33:27	O	O	ph p2 - na - Dispstn Code = NOA - man		
2021/10/11	10:43:06	O	O	ph p1 - na - Dispstn Code = AMD - man		
2021/10/11	10:46:31	O	O	ph p2 - na - Dispstn Code = NOA - man		
2021/10/08	8:07:53	O	O	ph p1 - na - Dispstn Code = AMD - man		
2021/10/08	8:46:55	O	O	ph p2 - na - Dispstn Code = AMD - man		
2021/10/08	9:57:56	M	V	COMPLETED RE-DISBUR 33333 TO 08253 BY INISHACLAR	8253	100
2021/10/07	11:22:20			A/R entered - O,AMN	6126	
2021/10/07	11:22:23			P1-7034727447 dialed, Dur :26	6126	
2021/10/06	38:43			*** No Bkrpcy / Dec info received ***		
2021/10/06	38:43			***** Information received from Score/BKP/DEC request *****		
2021/10/06	38:46			***** TRANS UNION LOCATOR INFO REQUESTED *****		000
2021/10/06	40:46			***** TLO REQUEST SENT *****		
2021/10/06	55:20			*** TU TLO INFORMATION RETURNED *****		
2021/10/06	55:21			***** CBCInnovis INFORMATION REQUESTED *****		000
2021/10/06	59:21			***** CBCInnovis REQUEST SENT *****		
2021/10/06	8:12:39			**NO SCRA INFO RECEIVED BORROWER**	12796	
2021/10/06	23:13:53	O	0	FIRST LETTER SENT AUTOMATICALLY		
2021/10/05	16:20:00			SCRA info requested		
2021/10/05	16:30:01			***** Score / BKP and DEC Information Requested *****		
2021/10/05	19:30:02	*	*	SCORE AND BANKRUPTCY INFO REQUESTED FROM TRANS UNION		

CLIENT COMMENTS ACCOUNT NUMBER: T60 xxxxxxxxxxxx7161 REFERENCE NUMBER: 027681996

19660305 00000000 Y 20211005 Y

M1186582 5148875054857161

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BARCLAYS BANK DELAWARE SECLGL BARCLYBARCLY

BARCLAYS BANK DELAWARE

20211006 202110062021100520211006 2021100520211005

BARCLAYCARD REWARDS MASTERCARD

CREDIT CARD

CLIENT ID#: M1186582

ORIG CRDTR: BARCLAYS BANK DELAWARE

CURR CRDTR: BARCLAYS BANK DELAWARE

PL CODE: BARCLY FC CODE: BARCLY

ORIG CRDTR LPDT: 20201221 LPAMT: 116.00

DOB: 19660305

MILITARY: N

MILITARY: N TRAK PLC DATE: 20211004

2021/12/15
17:19:51

LTD FIN SVCS (post)
ACCOUNT INFORMATION

PAGE 4
SCRIP340
SONDRAJURI

CLIENT COMMENTS ACCOUNT NUMBER: T60 xxxxxxxxxxxxx7161 REFERENCE NUMBER: 027681996

FWDR AGCY: LTDF
MERCHANT: BARCLAYCARD REWARDS MASTERCARD
ASSET TYPE: CREDIT CARD
COLLECTABILITY SCORE: 614 ...2021/10/06

END OF INFORMATION ACCOUNT NUMBER: T60 xxxxxxxxxxxxx7161 REFERENCE NUMBER: 027681996 END OF INFORMATION

PERSONAL AND CONFIDENTIAL



P.O. Box 513018, Los Angeles, CA 90051-1018
Tel. (949) 715-0644 · Fax (949) 315-4332
Support@LPGLaw.com

276 81996



158 1 SP 0.530 *****SNGLP 956

1.2.582696.S1.1

LTD FINANCIAL SERVICES, L.P

PO BOX 421529

HOUSTON TX 77242-1529

Re: Charlotte McCain

Dispute of Account: **1996**

To Whom it May Concern:

I represent Charlotte McCain in connection the above-referenced account.

My client disputed the above-referenced account with the credit bureaus and the original creditor. Despite those disputes, it seems that the account has been placed for collection with your company. Please take note that my client continues to assert the disputes and adamantly contests the collectability of the account.

Pursuant to the Fair Debt Collection Act, found at 15 U.S.C 1692 et seq., my client requests that you provide validation of the account including a copy of the operative contract, a summary of the charges making up the alleged balance, and/or any applicable collection agreements.

Additionally, on behalf of my client, I hereby demand that you **CEASE AND DESIST** all further communications with my client and direct all communication regarding this account to me at the contact information provided above.

If you have any questions, please call me at 940-715-0644 to discuss further.

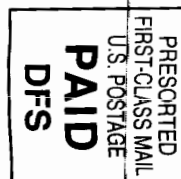
Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel S. March'.

Daniel S. March

LTD006

Litigation Practice Group
1351 Calle Avanzado Suite 4
San Clemente, CA 92673



Dec 07 2021
12 45P

LTD008

October 25th, 2021

PERSONAL AND CONFIDENTIAL



P.O. Box 513018, Los Angeles, CA 90051-1018
Tel. (949) 715-0644 · Fax (949) 315-4332
Support@LPGLaw.com



158 1 SP 0.530 *****SNGLP 956

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LTD FINANCIAL SERVICES, L.P

PO BOX 421529

HOUSTON TX 77242-1529

Re: Charlotte McCain

Dispute of Account: **1996**

To Whom it May Concern:

I represent Charlotte McCain in connection the above-referenced account.

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If you have any questions, please call me at 940-715-0644 to discuss further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan S. March'.

Daniel S. March

LTD009

The Litigation Practice Group

P.O. Box 513018

Los Angeles, CA 90051



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